

BOSTON HARBOR ISLANDS GENERAL MANAGEMENT PLAN

FINAL ENVIRONMENTAL IMPACT STATEMENT

Boston Harbor Islands National Park Area
Massachusetts
National Park Service
Northeast Region

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ABSTRACT: The proposals presented and analyzed establish concepts for possible future management directions for Boston Harbor Islands national park area, consistent with National Park Service policies. The alternatives make clear that adoption of the plan will not result in changes to the resources so much as it will set policy-level direction for future decisions to be made by the diverse agencies that cooperatively manage the park. The primary action of the general management plan is to designate specific "management areas" for each area of the park. These geographic areas prescribe broad direction for resource management, visitor use, and development of park facilities. The approach taken is general; the plan is not detailed, specific, or technical in nature, nor are there detailed or site-specific proposals to analyze. The plan calls for additional environmental analysis when specific actions are proposed in the park. Public and agency review and comment did not result in substantial modifications to any of the alternatives or the environmental analysis presented in the draft environmental impact statement, so an abbreviated format is used for the final.

BOSTON HARBOR ISLANDS PARTNERSHIP

National Park Service

United States Coast Guard

Massachusetts Department of Conservation and Recreation (2 seats)

Massachusetts Water Resources Authority

Massachusetts Port Authority

Boston Office of Environmental Services

Boston Redevelopment Authority

Thompson Island Outward Bound Education Center

The Trustees of Reservations

Island Alliance

Boston Harbor Islands Advisory Council (2 seats)

BACKGROUND

BACKGROUND, EIS DISTRIBUTION, AND HOW TO USE THIS DOCUMENT

BACKGROUND

This document is a final environmental impact statement (EIS) that follows public review (June 2 – August 1, 2000) of the draft Boston Harbor Islands national park area general management plan and draft EIS. Because public and agency comments did not substantially modify any of the alternatives or the environmental analysis in the draft EIS, the full text of the draft has not been reprinted. Rather, the materials in this document, combined with the draft EIS, serve as an abbreviated final EIS.

The environmental impact statement was developed in accordance with the National Environmental Policy Act (NEPA) to describe the environmental consequences of actions proposed in the general management plan, and to show how comments from the public influenced changes made in the proposed actions. Federal regulations include an option for responding to public comment on draft environmental impact statements when few changes result from those comments. The relevant section of these regulations (CFR 1503.4) states that if changes in response to public comments are minor and confined to factual corrections or explanations of why comments do not warrant further agency response, they may be written on errata sheets instead of rewriting, printing, and distributing the entire revised EIS. The following errata sheets are an attachment to the draft EIS.

EIS DISTRIBUTION

The officials, agencies, tribes, and organizations listed in the consultation and coordination section of the Errata are receiving the final general management plan and this document, to supplement the draft EIS distributed previously. All individuals who commented on the draft EIS are receiving the final general management plan and this document.

This document is available on the Internet at www.nps.gov/boha/parkdocs/fgmp. The draft EIS is also posted on line as a PDF document, along with the general management plan.

To view on line

www.nps.gov/boha/parkdocs/fgmp

To obtain a printed copy of the complete EIS or the location of agencies or libraries that have copies, contact the Boston Harbor Islands project office. Copies will be sent to those who request them until the current supply is exhausted.

To request a printed copy
boha_information@nps.gov
617-223-8666
Project Office
Boston Harbor Islands
408 Atlantic Avenue, Suite 228
Boston, Massachusetts 02110

HOW TO USE THIS DOCUMENT

This document must be used in conjunction with the draft environmental impact statement for the Boston Harbor Islands general management plan. The two documents together make up the final EIS for the plan. The errata sheets that follow are organized with the same headings as the draft EIS. Sections of the draft EIS with no changes are omitted from the errata. Corrections to the text are noted by page and paragraph number. The left and right columns of each page are indicated by “L” and “R.” For example, the second paragraph in the left column of page 100 would be noted as “page 100: paragraph L-2.” The whole paragraph is reprinted, regardless of the number of changes, in order to provide context for the reader of this document. A partial paragraph at the top of a column in the draft EIS is counted as the first paragraph.

Material within a paragraph that has been deleted is shown by a ~~strikeout~~ and added text is underlined. Changes of entire paragraphs are indicated by “delete,” replace,” or “add.” Typographical, spelling, and punctuation errors are not changed unless necessary to make the passage understandable.

This document contains four parts:

- COVER SHEET – includes the responsible agency, contact person, and abstract.
- BACKGROUND – describes the elements of the abbreviated final EIS.
- ERRATA – shows corrections and revisions to the draft EIS for the Boston Harbor Islands general management plan.
- COMMENTS AND NOTES ON GMP & EIS CHANGES – (1) a summary of key topics that emerged in oral and written comments on the draft EIS, and (2) copies of comment letters received with responses.

ERRATA

ERRATA SHEET ATTACHMENTS TO DRAFT ENVIRONMENTAL IMPACT STATEMENT

INTRODUCTION

page 75: paragraph Left-column-1

The first section of the ~~Draft Environmental Impact Statement (DEIS)~~, Affected Environment, describes the current state of the natural environment, the cultural environment, and the socioeconomic environment of the Boston Harbor Islands. The next section contains a summary of the management alternatives, and a summary of environmental impacts on the resources, the public, and the socioeconomic environments. The ~~DEIS~~ is concluded with a section on consultation, public involvement, and compliance with other related laws.

page 75: replace paragraph L-2 with the following

An extensive participatory process has characterized the development of the general management plan and environmental impact statement, starting in 1997. The process involved public meetings, formal and informal consultation with stakeholders, newsletters, a Web site, direct mailings, and monthly meetings of the Boston Harbor Islands Partnership planning committee. In June 2000, a draft general management plan and draft environmental impact statement were released for public review. Sixty-seven written comments were received during a 60-day period. Comments from all these sources were considered by the Boston Harbor Islands Partnership and the National Park Service and informed the preparation of the final general management plan and final environmental impact statement.

page 75: replace paragraph L-3 with the following

Following public review, the Boston Harbor Islands Partnership unanimously endorsed the plan and directed that it be submitted for review by the Governor of Massachusetts and then consideration by the National Park Service Northeast Regional Director. Now, following review by the governor and after the final environmental impact statement and plan have been available to the public for 30 days, the Northeast Regional Director will decide whether to adopt the general management plan. A record of decision will be prepared.

page 75: delete paragraph L-4

page 75: add the following after paragraph R-1

An abbreviated format has been used for the final environmental impact statement because changes to the draft EIS are confined primarily to factual corrections and do not modify the analysis.

Use of this format is in compliance with the 1978 implementing regulations (40 CFR 1503.4[c]) for the National Environmental Policy Act.

page 75: R-3

Basic to the alternatives is a set of geographic management areas each describing a range for future resource conditions and future visitor experiences. Infrastructure development and relative level of visitor use allowed within each geographic management area provide the starting point for predicting the impacts contained in the ~~DEIS~~ environmental impact statement. Those impacts are based on the highest allowance in each management area.

AFFECTED ENVIRONMENT

NATURAL ENVIRONMENT

GEOLOGY AND COASTAL PROCESSES

page 77: replace paragraph L-3 with the following

Boston Harbor is part of the Boston Basin, a topographic lowland underlain by sedimentary strata deposited at the end of Precambrian time. On the south cost of the Harbor, these strata appear in outcrops of Roxbury Conglomerate (younger than 595 million years at Squantum) containing boulders eroded by streams and glaciers from older volcanic highlands. Outcrops on the Harbor Islands themselves, including the Brewsters and Calf Island, belong to a shaley to slatey formation called Cambridge Argillite which was deposited on the muddy floor of an ocean dating some 570 million years ago. Argillite near Hingham contains fossil evidence for life forms pre-dating the “Cambrian explosion” of more familiar invertebrates like trilobites. All of these sedimentary strata, as well as 610 million- to 590 million-year-old volcanic and granite rocks surrounding the Boston Basin originated on the far side of the ancestral Atlantic Ocean and drifted into their present position to “dock” with eastern North America.

page 77: paragraph L-4

Drumlins may occur as scattered single hills, or in so-called swarms. The Boston Harbor Islands are a geological rarity, part of the only drumlin swarm in the United States that intersects a coastline. This “drowned” cluster of about 30 of more than 200 drumlins in the Boston Basin are not all elongate in shape, as most other drumlins are. While nearly all drumlins were molded in the direction of glacial flow (their steeper slopes facing the glacier's point of origin), the general northwest-to-southeast orientation of these drowned drumlins varies widely, diverging as much as 70 degrees from each other. By definition drumlins are formed by the direction of glacial flow, and the direction of flow can vary within one glacier as the ice pushes over and around obstacles. It is likely that some of the drumlins were reworked to some degree during the time of glacial retreat when outflow from ~~glacial melt water~~ rivers was high. Geologists believe the islands illustrate two separate periods of glacial action. Most of the harbor islands are composed of two layers of glacial till, their bases laid down by glacial expansion during the early Pleistocene ~~Pre-EPOCH~~, when sea level was 20 meters lower than it is now, and their upper parts deposited when the ice retreated many thousands of years later, some 16,000 years ago. The lower till of some of the island drumlins has preserved delicate fossils that are not found in the upper layers. About a dozen of the islands are not drumlins, but outcrops of bedrock generally composed of Cambridge and Braintree ~~Argillite~~ Argillite. Their shape

and size were molded by glacial erosion; moving glacial ice removed preglacial soils and ground down surface material to expose the bedrock, which was polished by ice flow.

page 77: delete paragraph R-3

page 78: paragraph L-2

In general, the ~~geographic~~ geologic history of the islands can be summarized as, first, ~~glacial shaping of landforms~~ late Precambrian depositions of sedimentary strata comprised of Roxbury Conglomerate and Cambridge Argillite; second, Pleistocene glaciation to create drumlins with a new northwest-southeast orientation; ~~second~~ third, sea level rise after glacial retreat, which partly immersed the glacial hills to form islands, with erosion and deposition reorienting the islands to a northeast-to-southwest bearing; and ~~third~~ finally, human intervention, leading to greater local erosion control needs.

WATER RESOURCES

page 78: paragraph R-3

The natural watershed around Boston Harbor extends as far west as Hopkinton, Massachusetts, 25 miles inland. The farthest point from which water enters the Harbor is the Quabbin Reservoir about 65 miles to the west, which supplies water to Boston and more than 100 surrounding communities. Boston Harbor is an “estuary” system where the salt water of Massachusetts Bay mixes with fresh water from three rivers: the Charles, the Mystic, and the Neponset. The harbor shores include six of Boston’s neighborhoods (East Boston, Charlestown, North End, Fort Point, South Boston, and Dorchester) and seven other municipalities: Hull, Hingham, Weymouth, Quincy, Chelsea, Revere, and Winthrop. Although it has extensive development on its edge, the estuary provides valuable habitat for wildlife, a nursery for marine organisms, water filtration, and flood control.

page 78: paragraph R-4

Boston Harbor, with a mean tidal range of ~~9-1/2 to~~ 10.33 feet, ~~has~~ is one of the largest tidal ranges in the United States. Tidal currents within Boston Harbor vary greatly in speed and direction because of the irregular bottom topography and the large number of islands. ~~++~~ The highest speeds are found at the deepest levels, and the slowest speeds are found in shallow areas. Boston Harbor has a relatively slow “flushing” rate in which about one-third of the water is “replaced” during each tide cycle. Water quality is affected by flushing rates.

WATER QUALITY

page 79: paragraph R-1

... , undersized and poorly maintained treatment plants, and shoreline sewage overflows in rainstorms. Beaches were frequently closed, areas of the harbor were brown with sludge ~~sticks~~ slicks, and large sections of the harbor floor were virtually devoid of life. The harbor’s flounder were infamous for extraordinarily high rates of liver disease and also suffered from fin rot.

WETLAND AND AQUATIC MARINE VEGETATION AND WILDLIFE

page 81: replace paragraphs R-2, R-3, R-4, R-5, and R-6 with the following

The once-plentiful eelgrass is the only type of seagrass now present in Boston Harbor; it is now confined to only four isolated areas, the largest of which is near the south coast of Bumpkin Island. Seagrass beds are critical wetlands components of shallow coastal ecosystems where they hold sediment, providing food and cover for a great variety of animals.

Salt marshes, the most highly productive ecosystems in the world, are dominated by saltwater cordgrass and provide habitat for many marine organisms. More than 50 percent of the state's salt marshes have been filled. The largest remaining salt marshes on the islands are found on Thompson and Snake islands. Smaller brackish marshes have been identified on Calf, Grape, Lovells, and Peddocks. Mud flats, which generally occur on the periphery and at the expanding edges of salt marshes, are found on Raccoon, Snake, and Thompson islands.

Lobsters, crabs, and clams inhabit submerged portions of the islands. Mussels and barnacles cling to the intertidal zone. Jellyfish live in the surrounding waters. Several species of fish, including striped bass, bluefish, and winter flounder, live in waters surrounding the islands. Little Brewster, Nixes Mate, Shag Rocks, and other islands characterized by bedrock outcroppings contain rocky intertidal communities of rockweed and barnacles.

Harbor seals haul out on some of the outer islands. Because their feeding grounds or migratory routes are nearby, humpback, fin, minke, and North Atlantic right whales and white-sided and striped dolphins are potential, though rare, visitors, as are harbor porpoises.

PROTECTED SPECIES

page 82: paragraph L-3

The Natural Heritage Program lists six species known to exist within the park, including two species listed as threatened, and four of special concern. In 1994, the state also identified coastal heron rookeries on two islands as areas of special concern. The rare species are:

- barn owl – special concern, found on ~~Deer~~, Thompson, George's, and Lovell's islands
- common tern – special concern, found on Long Island
- least tern – special concern, found on Lovell's and Rainsford islands
- Northern harrier – threatened, found on Grape Island
- sea-beach dock – threatened, found on Thompson, Bumpkin, Grape, and Peddock's islands
- American sea-blite – special concern, found on Langlee Island

CULTURAL ENVIRONMENT

CULTURAL LANDSCAPES

page 84: paragraph R-2

Many islands may also be defined as “ethnographic landscapes,” those containing natural and cultural resources that associated people define as “heritage resources” such as contemporary

settlements, subsistence communities and burial grounds. Such places can be found on Peddock^s, Deer, Long, the Brewsters, and many other islands. On Peddock^s Island, a community of summer cottages, previously a fishing village, has been in active use for nearly 100 years. ~~On Deer Island, the tragic internment of “Christian Indians” during King Philip’s War marks a chapter in the region’s history and is a place of great importance to contemporary Indians.~~ Deer Island, where Native Americans were forcibly moved by the Massachusetts Bay Colony during the winter of 1675–76 and held in what has been called a concentration camp, is an important site in the region’s history and place of great importance to contemporary American Indians.

ARCHEOLOGICAL SITES

page 85: paragraph L-3

The Boston Harbor Islands have a rich human history, some of which is revealed by physical evidence including prehistoric and historic archeological resources. The islands contain evidence of American Indian use of such archeological significance that, to date, 21 islands have been designated within an archeological district listed on the National Register of Historic Places. Archeologists assume that all islands not surveyed have potential prehistoric or pre-contact sites. In particular, the park’s enabling legislation directs that park managers include programs to protect Indian burial grounds and sites associated with the King Philip’s War period and other periods.

page 85: paragraph L-4

Soils, which contain highly alkaline shell fragments, have helped preserve bone as well as remains of tools and foods that typically deteriorate in New England soils. This, coupled with the fact that most of the islands were never long or intensively inhabited by Euro-Americans, suggests that they are likely to provide the best remaining or most easily retrievable evidence of ~~prehistoric pre-contact~~ human occupation in the Boston Bay area. Similar mainland sites are less likely to have survived undisturbed. Archeologists have established that the islands were used or inhabited by humans at least 8,000 years ago, and a 4,100-year-old human skeleton unearthed on one island in the late 1960s is one of the oldest ever excavated in New England. ~~Most known shell middens, essentially dumps for food and other waste, . . . , corroborating~~ Shell middens corroborate local historical speculation about the popularity of the islands for shellfishing among American Indians. ~~Sites of other middens may since have been covered by the rising sea level.~~ Archeological evidence suggests that Native Americans also used the islands for fishing, hunting, gathering plants, agriculture, processing food, tool manufacturing, and social and ceremonial activities.

page 85: delete paragraph R-2

page 86: paragraph L-1

ETHNOGRAPHIC SITES

. . . Indians, quarantined immigrants, farmers, orphans, “paupers,” military personnel, and tens of thousands of prisoners (at the recently demolished county house of corrections), but it has special significance to American Indians as a place of internment in King Philip’s War. During the winter of 1675–76, American Indians from at least four “praying villages”—people who had become Christianized and were friendly with the English settlers—were forcibly removed to Deer Island. Estimates of people held on the islands vary, but research indicates that at least half of the American Indians on the islands died of exposure or lack of food, water, or appropriate medicines. ~~Those that were finally released in May 1676 dispersed because their existing communities had become devastated.~~ Records indicate that the colonial government sold some Indians into slavery, or

indentured them to English families. But other praying Indians who were released moved into and strengthened Christian Indian settlements. Praying Indians also dispersed to other Native communities including the Nipmucks, Nipmucs, Wampanoags, and Abenakis (Penobscots) and to communities farther south, west, and north in Canada. They were joined by traditional Indians who sought refuge in these communities. Native Americans return to Deer Island every year in October to solemnly commemorate their ancestors' suffering in this sorrowful historical chapter.

ENVIRONMENTAL CONSEQUENCES

SUMMARY OF MANAGEMENT ALTERNATIVES

RESOURCE PROTECTION

page 91: paragraph L-4

- Snake, Sheep, Hangman, Green, Calf, Little Calf, Middle Brewster, Outer Brewster closed (or seasonally ~~restricted~~ restricted) to protect habitat or nesting sites of wildlife disturbed by human presence
- Invasive plants in designated places reduced; revegetation
- Vegetation managed for habitat health, to maintain established views, to open up new views
- Restoration of native species, where appropriate
- Trails developed and maintained to keep visitors from compacting soil
- Boardwalks through salt marshes.
- Effort to engage public in stewardship of resources

VISITOR ACCESS, USE, AND ENJOYMENT

page 96: paragraph R-1

- Water shuttles make circuits several times a day to some islands, less frequently to others depending on demand. Islands may include George's, Spectacle, Gallop's, Lovell's, Grape, Bumpkin, Deer, ~~Nut~~, Great Brewster, Rainsford, ~~World's End~~, Thompson, and Little Brewster.
- Some remote islands may occasionally be visited by small craft in organized excursions.

page 97: L-1

- Water shuttles make regular circuits once or several times daily among George's, Spectacle, Deer, Gallop's, Lovell's, Grape, Bumpkin, and Peddock's
- Rainsford, ~~World's End~~, and Thompson might have less frequent boat service
- Great Brewster and Little Brewster accessible by organized excursions.

ENVIRONMENTAL IMPACTS

IMPACTS ON NATURAL RESOURCES

page 104: paragraph R-2

Under Alternative A, development of trails, campsites, or facilities would remove vegetation and increase the potential for loss of soil or wildlife habitat. However, this alternative includes the most acres placed in natural resource emphasis. Actions in this management area include the control of exotic plants, habitat or species restoration, and ecosystem restoration. These actions would favor the return of native plant species and the loss of exotics from the mix of upland vegetation covering the islands now. Alternative B involves more development of the islands than Alternative A, and additional non-native vegetation would likely be removed as a result. It also has fewer acres in the natural features management area. Because the environmental analysis does not assume that island vegetation is not will be managed to eliminate exotics or return native species unless it is in the natural features management area, this alternative may result in some small improvements compared to No Action, but have less advantages for native vegetation than Alternative A. Alternative C would involve less development on islands that are now in a natural or semi-natural state than Alternative B. It also includes some islands placed in natural features emphasis which are subject to additional development as “managed landscapes” in Alternative B. Therefore the amount of vegetation removed would be less than in Alternative B, and the likelihood that native species would return would be greater than in Alternative B or No Action.

page 105: paragraph R-2

Alternative A has the largest acreage of this type, and so could result in elimination of non-native mammals. It also has the least area proposed for development and the fewest visitors on the islands. These factors would mean it would create the least displacement and disturbance of the action alternatives. Alternative B would likely remove the greatest amount of habitat used by terrestrial mammals on the islands and create the most disturbance through noise and the presence of human activity. The impacts of Alternative C would be similar to those of Alternative A initially. However, if visitor demand increases, additional islands identified in the plan as “hub islands” would be developed and some wildlife habitat removed in those areas.

CONSULTATION AND COORDINATION

SUMMARY OF PLANNING

page 112: paragraph L-3

Considerable public comment followed the publication of the alternatives newsletter in which two alternative management concepts were presented. The Planning Committee and the NPS team made a presentation to the Partnership and the Advisory Council, attended a number of public meetings, and held many discussions to reach the conclusion that a third alternative concept was desired, which combined features from each original concept. Thus, Alternative C was created. Subsequently, the relative environmental impacts of each alternative have been analyzed and a preferred alternative has been selected. The preferred alternative, Alternative C, has been was endorsed by both the Partnership and the Advisory Council. ~~However, the Partnership will~~

~~reconsider all alternatives and make a final selection following public review of and comments on the draft general management plan and draft environmental impact statement.~~

page 112: add the following after paragraph L-3

In June 2000, the draft general management plan and draft environmental impact statement were released for public review. During the subsequent 60-day comment period, 8 formal public meetings were hosted by the Boston Harbor Islands Advisory Council (a federal advisory committee) and approximately 5,000 copies of a summary of the proposal were distributed inviting comment (with a mail-back comment card). Sixty-seven written comments were received during the 60-day period. Comments from all these sources and from consultation with American Indian Tribes were considered by the Boston Harbor Islands Partnership and the National Park Service and informed the preparation of the final general management plan and final environmental impact statement.

Following public comment the Boston Harbor Islands Partnership unanimously endorsed the plan, contingent on the final environmental analysis, and directed that it be submitted to the Governor of Massachusetts and the National Park Service Northeast Regional Director. The plan was transmitted to the Governor on August 8, 2002. The 90-day gubernatorial review period, which was required by the park enabling legislation, concluded without a request for modifications to the plan. At the end of the review period, the Secretary of Environmental Affairs commended the Partnership on behalf of the Commonwealth of Massachusetts for the “extraordinary consultation process and spirit of inclusion” that resulted in the general management plan.

COMPLIANCE WITH FEDERAL AND STATE LAWS AND REGULATIONS

page 112: paragraph L-4

In implementing the Boston Harbor Islands general management plan, the Partnership agencies will comply with all applicable laws and executive orders, such as those listed below. Consultation and coordination with appropriate federal and state agencies have been conducted during the preparation of this document. Regarding cultural resources, consultation with the State Historic Preservation Office (SHPO) under the ~~1995~~ nationwide Programmatic Agreement was initiated in June 1999, and a review copy of the draft general management plan and draft environmental impact statement was submitted in August 1999. The combined draft plan and EIS was submitted for formal review in June 2000, and changes were made to the general management plan and final EIS in response to comments returned by the SHPO. In March 2001 text proposed regarding a park-specific programmatic agreement was shared with the SHPO for review and comment (that text was inserted on page 113). Consultation also took place with the U.S. Fish and Wildlife Service; National Marine Fisheries Service; USDA Natural Resources Conservation Service; Environmental Protection Agency; Massachusetts Environmental Policy Office; Massachusetts Natural Heritage and Endangered Species Program; and others.

CULTURAL RESOURCES

page 112: paragraph R-3

Cultural resources within the Boston Harbor Islands will be managed in accordance with ~~National Park Service policies, including the “organic act” of 1916; federal laws, regulations, and policies and those of the Commonwealth of Massachusetts. Federal laws that apply include the Antiquities Act of 1906 (16 USC 431); the National Park Service “organic act” of 1916 (16 USC 1);~~

the National Historic Preservation Act of 1966, as amended (16 USC 470); the National Environmental Policy Act of 1969, as amended (42 USC 4321, 4331, 4332); the Archeological Resources Protection Act of 1979 (16 USC 470~~aa-mm~~); and the Native Americans Graves Protection and Repatriation Act of 1990 (25 USC 3001). Management of cultural resources on islands not owned by the United States is subject to Massachusetts law and regulations, including those that cover archeology (M.G.L. Ch. 9 ss.26-27C; 950 CMR 70), underwater archeology (M.G.L. Ch. 6 ss.179-180; M.G.L. Ch. 91 s.63; 312 CMR 2), Native American burials (M.G.L. Ch.7 s.38A; M.G.L. Ch.9 s.26A & 27; M.G.L. Ch. 38 ss.6B-6C; M.G.L. Ch. 114 s.17), historic structures/sites (M.G.L. Ch. 9 s.26-27C), and state review and compliance (M.G.L. Ch. 9 ss.26-27C; 950 CMR 71).

page 113: replace paragraph L-2 with the following

Interpretation of federal responsibilities for protection of historic properties is detailed in the Code of Federal Regulations at 36 CFR 800 and in standards and guidelines published by the Advisory Council on Historic Preservation (ACHP) and the Secretary of Interior. Guidelines specific to the National Park Service are detailed in the Director's Order for Planning (DO-2) and the Cultural Resource Management Guideline (DO-28).

Section 110 of the National Historic Preservation Act requires that federal agencies identify, evaluate, and nominate historic properties under their jurisdiction to the National Register of Historic Places. Section 106 of the act requires all federal agencies to take into account the effect of their undertakings on properties that are listed, or eligible for listing, on the National Register. According to 36 CFR 800.16.y, an undertaking is:

a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with federal financial assistance; those requiring a federal permit, license, or approval; and those subject to State or local regulation administered pursuant to a delegation or approval by a federal agency.

Federal agencies are required to give the State Historic Preservation Office and the federal Advisory Council on Historic Preservation (ACHP) an opportunity to comment on any undertakings that will have an effect on National Register listed or eligible properties. The Advisory Council's Final Rule, Protection of Historic Properties (36 CFR 800), spells out the responsibilities and sequencing for federal agencies under section 106.

page 113: replace paragraph R-1 with the following

In implementing the approved general management plan, the National Park Service will endeavor to develop a programmatic agreement with the Massachusetts State Historic Preservation Officer that establishes exclusions for specific actions that are not likely to have an adverse effect on cultural resources. Crafting such an agreement must take into account the unique management structure of the Boston Harbor Islands while being consistent with the requirements of 36 CFR 800. Unless otherwise stipulated in a programmatic agreement, undertakings must be reviewed by the Massachusetts SHPO before implementation. Actions that will have an adverse effect on historic properties may also entail consultation with the Advisory Council on Historic Preservation. In all cases, the National Park Service will consult with the SHPO regarding identification of National Register eligible properties.

page 113: replace paragraph R-2 with the following

Prior to any construction or other ground disturbing action by park managers, a professional archeologist shall determine the need for archeological evaluation or testing. The State Archeologist determines the need and scope of archeological surveys and issues permits for the conduct of archeological investigations on all lands owned by the Commonwealth and its political subdivisions. The Partnership follows its consultation policy (GMP, page 95) when identifiable human remains may be disturbed or are encountered on park lands. The Partnership confers with the Massachusetts State Archeologist and Commission on Indian Affairs consistent with applicable provisions of law. Detailed operating procedures for the Boston Harbor Islands are developed in consultation with American Indian tribes, state historic preservation officer, tribal historic preservation officers, appropriate state and municipal agencies (such as the City of Boston archeologist) and professional archeologists.

page 113: at the bottom of the page, delete the table and attendant text

LIST OF ~~DE~~IS RECIPIENTS

pages 114 & 115: replace all paragraphs on 114 and replace paragraph L-1 on page 115 with the following

All individuals who commented on the draft EIS and the following officials, agencies, tribes, and organizations are receiving the final general management plan and final EIS.

FEDERAL ELECTED OFFICIALS

Senator Edward M. Kennedy
Senator John F. Kerry
Congressman Michael Capuano – 8th Congressional District
Congressman William Delahunt – 10th Congressional District
Congressman Barney Frank – 4th Congressional District
Congressman Stephen A. Lynch – 9th Congressional District
Congressman Edward Markey – 7th Congressional District
Congressman John Tierney – 6th Congressional District

FEDERAL AGENCIES AND OFFICES

Advisory Council on Historic Preservation
Boston Harbor Islands Advisory Council
Boston Harbor Islands Partnership
Department of Agriculture
 Natural Resources Conservation Service
Department of Commerce, National Oceanic and Atmospheric Administration
 National Marine Fisheries Service
Department of the Interior
 U.S. Fish and Wildlife Service
Environmental Protection Agency
John F. Kennedy Library

Massachusetts State Historic Preservation Officer
United States Coast Guard

FEDERALLY RECOGNIZED AMERICAN INDIAN TRIBES

Delaware Tribe of Western Oklahoma (Anadarko) (formerly Delaware Nation, Oklahoma)
Delaware Tribe of Indians (Bartlesville) (Oklahoma)
Mashantucket-Pequot Tribal Nation (Connecticut)
Mohegan Indian Tribe of Connecticut
Stockbridge-Munsee Community Band of Mohican Indians (Wisconsin)
Narragansett Indian Tribe (Rhode Island)
Wabanaki Tribes of Maine
 Passamaquoddy Tribe
 Penobscot Indian Nation
 Houlton Band of Maliseet Indians
 Aroostook Band of Micmacs
Wampanoag Tribe of Gay Head (Aquinnah) (Massachusetts)

OTHER NATIVE AMERICAN TRIBES AND ORGANIZATIONS

Nipmuc (Hasanamisco)
Nipmuc Nation
Nipmuck Chaubunagungamaugg
Natick Nipmucs
Mashpee Wampanoag Tribe
Muhheconneuk Intertribal Committee on Deer Island
North American Indian Center of Boston

MASSACHUSETTS ELECTED OFFICIALS

Governor Mitt Romney
Senate President Robert E. Travaglini
Senator Robert A. DeLeo [commented on draft]
Speaker of the House Thomas M. Finneran

COMMONWEALTH OF MASSACHUSETTS AGENCIES

Commission on Indian Affairs
Department of Conservation and Recreation
Department of Environmental Protection
Department of Fish and Game
 Division of Marine Fisheries
 Natural Heritage and Endangered Species Program
Executive Office of Environmental Affairs
Historical Commission
Office of Consumer Affairs and Business Regulation
 Division of Energy Resources
Port Authority
State Police

Water Resources Authority

LOCAL AGENCIES

City of Boston
Office of Mayor Thomas M. Menino
Office of Environmental Services
Parks & Recreation Department
Redevelopment Authority
City of Chelsea
Town of Hingham
Town of Hull
City of Lynn
City of Quincy
City of Revere
City of Salem
Town of Weymouth
Town of Winthrop

ORGANIZATIONS

Appalachian Mountain Club
Beacon Management Company
Bosport Docking, LLC Constitution Marina
The Boston Harbor Association
Boston Sea Kayak Club
Conservation Law Foundation
Columbia/Savin Hill Civic Association
Dorchester Civic Association
Environmental Diversity Forum
Friends of the Lightship Nantucket
Fort Revere Park and Preservation Society
Greater Boston Chamber of Commerce
Greater Boston Convention and Visitors Bureau
Hull Chamber of Commerce
Hull Lifesaving Museum
Island Alliance
Independent Living Center of the North Shore & Cape Ann
Jones Hill Civic Association
Massachusetts Audubon Society
Massachusetts Bay Education Alliance
Massachusetts Marine Educators
Metropolitan Area Planning Council
Mystic View Task Force
National Parks Conservation Association
New England Aquarium
Roxbury Multi-Service Center
Save the Harbor/Save the Bay

Seaside Environmental Alliance
Sierra Club
The Trustees of Reservations
Thompson Island Outward Bound Education Center
Volunteers and Friends of the Boston Harbor Islands
Urban Harbor Institute/University of Massachusetts – Boston

COMMENTS

COMMENTS AND RESPONSES REGARDING THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

SUMMARY

The consensus of the public meetings and written comments was that the Boston Harbor Islands Partnership was pursuing the correct path in Alternative C, the preferred alternative. Throughout the comment period, several points were raised repeatedly. These are summarized below in seven statements, each with an explanatory response. Following this section are reprints of all written comments, along with responses.

COMMENT: “Information about island resources is very general.”

RESPONSE: Information about natural and cultural resources is necessary to inform management and operational decisions. This is one of the tenets of the general management plan which calls for a series of resource studies for this new park. The National Parks Omnibus Management Act and National Environmental Policy Act require that management decisions be based on ample technical and scientific studies properly considered and appropriate to the decisions being made. The public was particularly concerned about the need to have more details about plant and animal life in the park. Concern was expressed that the plan lacks sufficient detail for assessing effects on cultural resources.

General management planning is only the first phase of a tiered planning and decision making process under National Park Service guidelines. The general management plan and the attendant environmental impact statement utilized the best available data about natural and cultural resources. During planning, two workshops were held with island managers to identify potential repositories of resource data. NPS researchers visited more than 40 institutions to locate island-specific information—these included area universities, public libraries, government and private archives, and agency files. Numerous on-line searches were conducted. We recognize that there are a number of significant gaps in our understanding of the natural and cultural resources of the Boston Harbor Islands and of their larger contexts. Moreover, there is a need to pull together disparate threads of study into a coherent body of knowledge for the Boston Harbor Islands as a whole. The National Park Service and the Partnership have several research projects under way and have requested funding for others that will help rectify deficiencies in our knowledge of the islands and their resources. This new data will be used during implementation of the broad proposals of the general management plan and to conduct environmental compliance for specific actions as proposed.

COMMENT: “It is not clear how funding will be secured to implement this plan.”

RESPONSE: Implementation of the plan relies on a mix of funding from public and private sources. Because public agencies generally are prohibited from committing funds in advance of appropriations, it is not possible to determine proportional contributions from federal, state, and

local agencies in a long-range plan such as the general management plan. The general management plan contains a new section on park financing (p. 85), which address this point and further explains the role of the Island Alliance. The plan also states the intention that major infrastructure expenses will be paid from public funds, but that funding strategies and specifics of funding are the purview of implementation plans. Two new appendices were added to the plan too, Financial Accountability Guidelines (p. 138) and Economic Sustainability Strategy, 2001–2011 (p. 139).

COMMENT: “We would like a specific area to be developed (or not developed) as a ‘mainland gateway’ to the islands.”

RESPONSE: Respondents suggested specific locations for gateways and asked how gateways were designated. Some objected to a gateway shown in the plan. All of the gateways shown in the plan are “potential” gateways, not “proposed” gateways. Gateways are defined as departure points to the island that meet specific criteria, whereas other access to the harbor may be available at many sites along the shore. Mainland gateways will require investment in infrastructure beyond the means of the Boston Harbor Islands Partnership agencies; collaboration by local governments will be essential in their development. In the plan, the criteria for gateways have been elaborated to give more guidance to municipalities and others who may propose a site for an officially recognized gateway (p. 75). Groups can assure representation of their interests by participating in the public processes for gateway designations.

COMMENT: “Protect natural resources and ensure that the individual island visitation levels are appropriate based on identified carrying capacity.”

RESPONSE: The overarching purpose of the general management plan is to keep park resources unimpaired for future generations and this is stated throughout. For example: “The Partnership seeks to protect and preserve park resources unimpaired, while providing for public enjoyment of those resources. Because public enjoyment cannot be sustained if park resources are damaged or compromised, resource protection must necessarily be the Partnership’s paramount responsibility” (draft p. 39, final p. 73). The plan also calls for establishing appropriate types and levels of visitor use for the Boston Harbor Islands through visitor “carrying capacity” (see draft p. 35 & 39, final p. 66 & 74). Public comment is taken as an endorsement of these fundamental concepts and a reminder to keep them in the fore.

COMMENT: “A dock for park transportation should not be considered for Worlds End.”

RESPONSE: Concerns were raised about changes in visitor use at Worlds End and about potential resource damage if a dock were built to connect to the park water shuttle route. Auto traffic in the surrounding residential area and parking limitations were also mentioned as problems. While the general management plan did not propose a dock be built (only that it was an option for the future evaluation) The Trustees of Reservations eliminated the proposal based on further consideration and discussions with residents of Hingham and Hull. An engineering study showed that, due to topography and water depths, a pier with gangway and float would be more than 300 feet long. Construction of such a sizable structure was deemed unacceptable. The option of a pier at Worlds End was subsequently removed from the general management plan and environmental impact statement.

COMMENT: “The draft general management plan displays insensitivity to Native American issues and inaccurately presents Indian history.”

RESPONSE: The park’s 1996 legislation highlights the importance of understanding the history of Native American use and involvement with the islands and calls for protecting and preserving Native

American burial grounds from all periods, particularly the King Philip's War internment period. Concern was repeatedly expressed about this important matter. To highlight the issue a separate policy on cemeteries and burials was written for the draft. It was rewritten for the final (GMP, p.64), based on comments received, in order to strengthen and clarify the policy's intent. In general, the final plan contains a re-commitment to protect Native American burial sites, to continue to work with Indian tribes to develop interpretive and educational programs, and to work with tribes to develop an Indian cultural center.

Tribes (both federally and state recognized), the Massachusetts Commission on Indian Affairs, the Boston Harbor Islands Advisory Council, Native American organizations, and individuals suggested many changes concerning the way Native American history was presented in the draft plan and EIS. Suggestions were offered during consultation between NPS (on behalf of the Partnership) and the tribes, while revising text by the Boston Harbor Islands Partnership planning committee, and during public comment. In response, changes were made to correct errors and to address interpretation. The authors worked in cooperation with Advisory Council and Partnership planning committee members to revise the final text in a manner that is clear and respectful of the American Indian perspective.

COMMENT: "The Partnership should regulate recreational activities on the Boston Harbor water sheet and provide harbor access for small craft."

RESPONSE: The draft general management plan was criticized because it did not attempt to regulate recreational activities on the water surrounding the islands. Concern was expressed that visitors in small craft could have negative effects on park resources and values. While individually, several Partnership agencies have responsibilities for harbor resources and use (other than the islands), neither the Partnership nor the National Park Service has jurisdiction on the water sheet. This is not to say that we do not share the concerns expressed for both resource protection and for providing appropriate public access. Two steps were taken in response. A matrix was developed (GMP, p. 156) that portrays the complex jurisdictions covering Boston Harbor, as they relate to resource protection and public safety in the island park. In addition a new Harbor Management policy was written (GMP, p. 96) that clarifies the role of the Partnership in communicating and cooperating with all appropriate agencies to protect and preserve the resources and values of the park as well as to provide visitor services that support the mission of the park. A separate section of the policy collects ideas in one place to focus on water-based recreation, particularly working to provide greater access to the harbor for the public (GMP, p. 97).

WRITTEN COMMENTS AND RESPONSES

Many people, writing as individuals and for organizations, suggested refinements to ideas presented in the general management plan or sought clarification on certain points. We thank all who responded to the call for comments and ask that the public continue to voice concerns and suggestions, through the Boston Harbor Islands Advisory Council or the National Park Service project office. In addition we will continue government-to-government consultations with American Indian tribes and will consult with the numerous officials, agencies, and organizations with whom the Boston Harbor Islands Partnership and the NPS have ongoing relations.

Federal guidelines specify that we give responses to comments that are "substantive." Comments are considered substantive when they:

- reasonably question the accuracy of information
- reasonably question the adequacy of analysis
- present reasonable alternatives other than those presented
- cause changes or revisions in the proposal

Given these criteria, it may appear that some thoughtful and useful ideas were not heard. That is not the case. Although a comment may have not have triggered a change in the general management plan (the proposal) or environmental impact statement and thus warranted a “response,” we are always interested in hearing from people with ideas about managing Boston the Harbor Islands.

Each comment letter received during the official comment period is listed below with the page number where it is reproduced. The comment letter is presented in the left column of each page and any response that required changes is in the right column.

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